

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

On or about May 4, 2017, **FRANK CRAWFORD III** ("**CRAWFORD**"), then located in Virginia, engaged in a series of interstate communications through his cellular telephone with Victim A, then located in Maryland, to persuade Victim A to take—and to send to **CRAWFORD**—visual depictions of Victim A engaged in sexually explicit conduct. The following text messages were recovered from **CRAWFORD**'s telephone:

CRAWFORD: Enjoy walking around today?

Victim A: I legit am walking around with a dildo in my pussy

CRAWFORD: Ik how does it feel to be daddys new slut

CRAWFORD: Next class your in You ARE gonna ask to go to the latrine and show me that you have done what i told you


After this exchange, Victim A took and sent **CRAWFORD** a picture depicting Victim A in a bathroom stall with a sex toy inserted into her vagina.

Also in May 2017, **CRAWFORD** and Victim A communicated via an interactive live chat service that utilized the Internet. **CRAWFORD** and Victim A both engaged in masturbation during at least one chat session. **CRAWFORD** also sent Victim A pictures of his penis.

The following items were seized from **CRAWFORD** pursuant to a search warrant and each contained visual depictions of a minor engaged in sexually explicit conduct: a Hewlett-Packard Computer, Model 15-P030NR, Serial Number 5CD4327RN1; an HGST Hard Drive, Serial Number 140728JA1009C0KJTUSM; and a Samsung cellular phone, Model SMJ320P, Serial Number 089458893506721648.

At all times relevant to this case, Victim A was a resident of Maryland and also a minor who had attained the age of 12 years but not attained the age of 16 years. While in Maryland, Victim A sent pictures to **CRAWFORD** at his specific request. The pictures depicted Victim A engaged in sexually explicit conduct. **CRAWFORD** knew that Victim A was a minor.

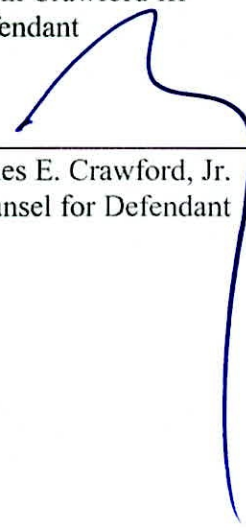
SO STIPULATED:



Joseph R. Baldwin
Assistant United States Attorney



Frank Crawford III
Defendant



James E. Crawford, Jr.
Counsel for Defendant